

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:22-CV-276-D-BM

NORTH CAROLINA GREEN PARTY,
ANTHONY NDEGE, MICHAEL
TRUDEAU, MATTHEW HOH,
SAMANTHA WORRELL, SAMANTHA
SPENCE, K. RYAN PARKER AND
AARON MOHAMMED

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS and DAMON CIRCOSTA,
STELLA ANDERSON, JEFF CARMON,
STACY EGGERS IV, TOMMY TUCKER,
and KAREN BRINSON BELL, in their
official capacities as members or employees
of the North Carolina State Board of
Elections,

Defendants.

**DECLARATION OF ROSE ELLEN
SEEMAN IN SUPPORT OF
PLAINTIFFS' EMERGENCY MOTION
FOR PRELIMINARY INJUNCTION**

1. I, Rose Ellen Seeman, hereby declare under oath and subject to the penalty of perjury that the following is true and correct to the best of my knowledge.

2. As the Campaign Manager for the Matthew Hoh for Senate campaign, I approved contracts with paid petitioners. I conducted weekly meetings with petitioners via Zoom starting on April 13, 2022 that continued throughout the petition gathering period. During these meetings I helped mentor petitioners on best practices for petitioning.

3. I traveled to North Carolina from April 19 – 25, 2022, to assist in petitioning efforts, working at the Waynesville Hemp Fest on April 20th and the Asheville Hemp Fest, April 21 – 23rd to collect signatures. The petitioning efforts were welcomed by the festivals' organizers. I worked

with other petitioners – Gayle Gorlewski, James Doonquah, and Nick DiDonna. Senate candidate Matthew Hoh also joined us in petitioning in Asheville. During this time, we displayed prominent Green Party branding such as signs, t-shirts, and pins and were always clear in our requests that people sign to place the North Carolina Green Party on the ballot. The response from the public was positive and many signatures were collected during this period.

4. At the time the NCSBE said they were planning to investigate the petitions, the campaign cooperated fully with all requests made by the investigators.

5. On June 27th, I spoke on the phone with investigator, Matthew Martucci regarding the phone calls and texts people were receiving from the Democratic Senatorial Campaign Committee (DSCC) urging them to remove their names from the petition to place the North Carolina Green Party on the ballot. (I didn't raise the home visits with Mr. Martucci during this phone conversation because I would find out about them the following day, June 28th.) Mr. Martucci said that he believed this could be classified as "voter intimidation" and also said that the NCSBE had received at least one formal complaint about these calls/texts. He encouraged me to write a full report of my knowledge of these incidents including any witnesses who could be contacted. He told me that it would be forwarded to their legal department, and I would be notified of its receipt.

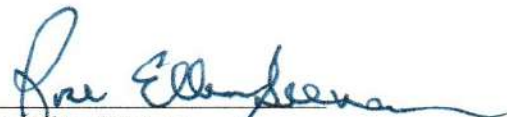
6. On June 29th, I submitted a letter to Mr. Martucci via email that detailed this harassment of petition signers and included the new information I had about the home visits. I also included evidence from people who had been subjected to these calls/texts/home visits -- a recording of NC Green Party co-chair, Tony Ndege, taking a call encouraging him to remove his name from the petition by someone who repeatedly claimed he was a volunteer for the Green Party; a screenshot of a petitioner signer's phone that showed repeated calls coming to her from

one of the numbers used for this operation in a period of less than 3 hours; a video of K. Ryan Parker receiving a home visit asking that he remove his name from the petition from a woman saying she was with the "NC Democrats"; and two detailed emails from people who had been harassed by phone, text, and a home visit. Although I asked for acknowledgement from the legal department that they were in receipt of my letter, I never received it or any other reply.

7. A true and correct copy of the June 29, 2022 letter that I sent to Mr. Martucci is attached to the Amended Complaint as Exhibit 1.

8. I declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing is true and correct.

Executed: 7/21/2022


Rose Ellen Seeman